

*[Submitting Counsel on Signature Page]*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

**OMNIBUS SEALING STIPULATION  
REGARDING DKT. NO. 2180**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5, October 11, 2024 Third Modified Protective Order (Dkt. No. 1209), and August 1, 2023 Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Plaintiffs and Defendants TikTok Ltd., TikTok LLC, TikTok Inc., ByteDance Ltd., and ByteDance Inc. (collectively, “TikTok Defendants”) and Plaintiffs (collectively, the “Parties”) submit this Omnibus Sealing Stipulation in connection with the Parties’ Joint Letter Brief on Whether Plaintiffs are Entitled to Additional Written Discovery, Document Productions, and a Deposition regarding Eugenia Cooney. (ECF No. 2179; ECF No. 2181 (corrected)).

On August 12, 2025, the Parties filed their Joint Letter Brief on Whether Plaintiffs are Entitled to Additional Written Discovery, Document Productions, and a Deposition regarding

Eugenia Cooney (hereinafter “Joint Letter Brief”) (ECF No. 2179, 2181), together with a Joint Temporary Sealing Motion (ECF No. 2180). The Parties filed the Joint Letter Brief with confidentiality redactions (at ECF No. 2179) and submitted a sealed unredacted copy of the Joint Letter Brief to the Court (ECF No. 2180-1; ECF No. 2181 (corrected)).

The Parties now agree that certain conditional redactions in the Joint Letter Brief, as reflected in the modified redacted version (Exhibit A) and described below, should remain sealed.

**I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR PROVISIONAL REDACTIONS**

Dkt. No.	Description	Requested Action	Language to Be Redacted	Basis for Sealing	Previously Sealed
2180-1	Joint Letter Brief	Sealed	Page 4, third paragraph, lines 4, 5 redact the words after “reported” to “by”, and the words after “external” to “partners”	Contains confidential information excerpted from confidential internal TikTok documents and/or deposition testimony.	No
2180-1	Joint Letter Brief	Sealed	Page 5, first paragraph, lines 6-8, redact everything after “TikTok feared” to “Further,”	Contains confidential information excerpted from confidential internal TikTok documents and/or deposition testimony.	No

The Parties agree that the portions of the Joint Letter Brief not listed in the above chart may be unsealed. The TikTok Defendants do not waive, and expressly reserve, their right to move to seal other material from, or derived from, documents quoted, paraphrased, characterized, or otherwise cited in the Joint Letter Brief. The confidentiality or appropriateness of sealing material other than the cited portions of the Joint Letter Brief is not currently at issue, and the TikTok Defendants do not waive any right with respect to that material.

Plaintiffs’ agreement to allow portions of the Joint Letter Brief to remain under seal is made in a good faith effort to resolve the current dispute and is not a concession that the agreed

redactions are mandated by law. Plaintiffs' agreement extends solely to the copy of the Joint Letter Brief and, as such, does not extend to any underlying documents or information within those documents. Plaintiffs reserve all rights to oppose sealing this same or similar information in the future, as well as to unseal or de-designate the Joint Letter Brief in its entirety in the future.

Pursuant to this Court's sealing procedures, the following are attached hereto: (i) a copy of the modified Joint Letter Brief, with the redactions agreed by the Parties listed above, (ii) the Declaration of Mark Sentenac supporting the requests to seal; and (iii) a Proposed Order on Undisputed Sealing Requests.

**IT IS SO STIPULATED AND AGREED**, through Counsel of Record.

Dated: September 12, 2025

Respectfully submitted,

**KING & SPALDING LLP**

By: /s/ Geoffrey M. Drake

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**ATTESTATION**

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 12, 2025

/s/ Geoffrey M. Drake  
GEOFFREY M. DRAKE